

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

TERI WOODS PUBLISHING, LLC

4525 Sansom Street
Philadelphia, PA 19139

and

TERI WOODS

4525 Sansom Street
Philadelphia PA 19139

Plaintiffs,

v.

DeSEAN WILLIAMS a/k/a

J.M. BENJAMIN a/k/a

JIMMIE BENJAMIN

125 Church Street
Plainfield, NJ 07060-1312 **and**

GASCH PRINTING, .INC.

1780 Crossroads Drive
Odenton, MD 21113 **and**

THE GLOBE PRINTING CO., INC.

129 W Neshannock Ave # B
New Wilmington, PA 16142 **and**

SEABURN PUBLISHING GROUP

33-18 Broadway
Astoria, New York 11106-1806 **and**

URBAN KNOWLEDGE

BOOKSTORE, LLC

1200 Mondawmin Conc,
Baltimore, MD 21217, **and**

Civil Action No. _____

Jury Trial Demanded

CONT'D

CARL WEBER, d/b/a :
URBAN KNOWLEDGE BOOKSTORE :
1200 Mondawmin Conc. :
Baltimore MD 21217, :
 :
AMAZON.COM, INC. :
1200 12th Ave. South :
Ste. 1200. :
SEATTLE, WA 98144-2734 :
 :
DEFENDANTS. :
_____ :

CIVIL COMPLAINT

Jurisdictions

1. Jurisdiction is vested in this Court by virtue of Title 17 U.S.C. §§ 101-810, to wit, the Copyright Act of 1976.

Parties

2. The Plaintiffs, Teri Woods Publishing, LLC and Teri Woods (hereinafter collectively referred to as "WOODS"), are a domestic limited liability company engaged as a mom-and-pop sort of book publishing company, and a private adult individual, respectively, doing business at the address above-indicated, and they are the rightful and lawful copyright holders of certain literary works, inclusive but not limited to the following books: "Dutch I", "Dutch II" a/k/a "Dutch II: Angel's Revenge", "Dutch III: International Gangster", "Deadly Reigns I", "Deadly Reigns II", and "Deadly Reigns III". Copies of the WOODS Certificates of Registration and U.S. Copyright Office Receipt pertaining to said literary works are attached hereto collectively as Exhibits P-1 through P-6 inclusive, and are incorporated by reference as though fully set forth herein and made a part hereof.

3. Subsequent to Woods acquisition of the copyrights to the above-referenced books, there were two (2) illegal, unauthorized books released through the “black market”, which books were derivative of plaintiffs’ copyrighted works- to wit, “Dutch: The Finale” a/k/a “Dutch: III” and “Deadly Reigns: The Next Generation”.

4. Defendant DeSEAN WILLIAMS a/k/a J.M. BENJAMIN a/k/a JIMMIE BENJAMIN (hereinafter “WILLIAMS”) is adult male individual doing business at the address above-indicated, and is the mastermind behind the unlawful and improper counterfeiting of WOODS’ copyrighted literary works, engaged in a scheme to unlawfully manufacture, distribute and sell WOODS’ copyrighted literary works for his own personal gain.

5. Defendants GASCH PRINTING, INC. (“GASCH”) and THE GLOBE PRINTING CO., INC. (“GLOBE”) are domestic corporations who are engaged in the manufacturing of, inter alia, books; Upon information and belief, defendants GASCH and GLOBE were hired by defendant WILLIAMS to illegally manufacture bootleg copies of WOODS copyrighted literary works and/or copies of the aforementioned illegal derivative works.

6A. Defendant SEABURN PUBLISHING GROUP (“SEABURN”) is a publishing company engaged in the manufacturing, distribution, and/or sale of books; ; Upon information and belief, defendant SEABURN was hired by defendant WILLIAMS to illegally manufacture and/or distribute and/or sell bootleg copies of WOODS copyrighted literary works and/or copies of the aforementioned illegal derivative works.

6B. Defendants URBAN KNOWLEDGE BOOKSTORE, LLC and CARL WEBER (collectively “URBAN KNOWLEDGE”), consist of a domestic limited liability company and its principal, respectively, doing business at their respective addresses above-indicated; said

defendants engaged in the unlawful distribution and/or sale of plaintiffs WOODS' copyrighted literary works and or of the aforementioned illegal derivative works.

6c. Defendant AMAZON.COM, INC. ("AMAZON") is a domestic company with its headquarters at the above address; defendant AMAZON is, inter alia, the seller of books.

7. At all times material hereto, the defendants acted on their own behalves, or they acted through the deeds of their employees, servants, agents, representatives, and the like, acting within their course of employment and scope of duties.

Factual Allegations

8. In 2005, plaintiffs WOODS duly filed with the Library of Congress FORM TX copyright applications for the literary works entitled, "Dutch" and "Dutch II Angels Revenge, and Certificates of Registration were duly issued in plaintiffs' favor. Exhibit P-1 and P-2.

9. In 2011 plaintiffs WOODS duly filed with the Library of Congress FORM TX copyright application for the literary work entitled, "Dutch III- International Gangster", and Certificate of Registration was duly issued in plaintiffs' favor. Exhibit P-3.

10. Plaintiffs WOODS are also the owners of the copyrights to "Deadly Reigns a/k/a Deadly Reigns I", "Deadly Reigns II" and "Deadly Reigns III". Exhibit P-4 through P-6.

11. Plaintiffs WOODS are the undisputed copyright claimants in regard to these six (6) literary works.

12. Further, only WOODS possesses the legal right to publish derivative works, such as sequels, to the above-mentioned six (6) literary works.

13A. In 2011, plaintiff TERI WOODS had a telephone conversation with Jeremy Hess, a principal and/or representative of defendant GASCH, which defendant informed

plaintiff WOODS that GASCH had been unlawfully printing books in violation of plaintiff's rights; this is the first time that plaintiffs had knowledge that GASCH had been involved in the unlawful violation of plaintiffs' copyrights.

13B. During or about March of 2012, plaintiff TERI WOODS was at the warehouse of defendant SEABURN, when she saw a large box containing "Dutch: The Finale" books with a shipping label addressed to SEABURN from co-defendant GLOBE; at which time plaintiff first learned that defendants Globe and Seaburn were engaged in the unlawful bootleg manufacturing, distribution and sale of books, in violation of plaintiff's rights, said books being unlawfully manufactured derivative books being inclusive but not necessarily limited to "Deadly Reigns: The Next Generation" and "Dutch:III a/k/a "Dutch: The Finale"; upon information and belief, WILLAMS has been involved in the unlawful manufacturing, distribution and sale of many thousands of unlawfully manufacturer books, in violation of plaintiffs' copyrights; defendant SEABURN enlisted the services of co-defendant GLOBE to print and manufacture certain of these books for SEABURN.

14. Plaintiffs as lawful copyright holders were required to grant permission to defendants, in writing, failing which defendants were prohibited under the Copyright Act as amended to manufacture, distribute and/or sell any of the aforepleaded illegal books in violation of plaintiffs' copyrights.

15. WILLIAMS enlisted the use of co-defendants GASCH, GLOBE and SEABURN to illegally manufacture, distribute and sell many thousands of unlawful, bootlegged books.

16. WILLIAMS further enlisted the use of co-defendants URBAN KNOWLEDGE to

assist WILLIAMS in the unauthorized and unlawful distribution and sale of plaintiffs WOODS' copyrighted literary works.

17. WILLIAMS further enlisted the use of additional individuals and entities, the identities of which are unknown at this time to plaintiffs, but whose identities may become known to plaintiff through discovery, at which time such additional individuals and entities who were also involved in the unlawful manufacturing, distribution and sale of plaintiffs' copyrighted literary works shall be named as additional defendants in this case.

Claims

COUNT I – COPYRIGHT INFRINGEMENT:

VIOLATION OF TITLE 17 U.S.C. §§ 101-810

(TERI WOODS PUBLISHING, LLC VS. ALL DEFENDANTS)

18. Plaintiff TERI WOODS PUBLISHING, LLC is the lawful and dutiful holder of certain copyrights pertaining to certain literary works. Exhibit P-1.

19. All defendants violated the Copyright Act of 1976, to wit, Title 17, U.S.C. Secs. 101 et seq., by engaging in the unlawful manufacturing, sale and distribution of plaintiffs' protected, copyrighted literary works and illegal derivative sequels.

20. Defendants' violations have been repeated numerous times, and are continuous and ongoing, and outrageous, willful, wanton, malicious, and committed with reckless disregard for the rights of plaintiffs.

21. As a result of defendants' infringement, plaintiffs suffered pecuniary damages, as well as damage to its reputation, goodwill, and other damages.

22. Defendants are liable to plaintiffs for unlawful copyright infringement.

WHEREFORE, on Count I, plaintiff TERI WOODS PUBLISHING, LLC demands judgment in its favor, and against all defendants, jointly and severally, as follows:

- a. For actual damages in the amount of Ten Million Dollars (\$10,000,000.00);
- b. For statutory damages of Nine Hundred Thousand Dollars (\$900,000)- [\$150,000 X 6 books]
- c. For reasonable counsel fees and litigation costs;
- d. For such other relief as this Court may deem proper.

COUNT II – COPYRIGHT INFRINGEMENT:

VIOLATION OF TITLE 17 U.S.C. §§ 101-810

TERI WOODS VS. ALL DEFENDANTS)

- 23. Plaintiffs incorporate all paragraphs above as if set forth in full herein.
- 24. Plaintiff TERI WOODS is the lawful and dutiful holder of certain copyrights pertaining to her literary works. Exhibit P-1.
- 25. All defendants violated the Copyright Act of 1976, to wit, Title 17, U.S.C. Secs. 101 et seq., by engaging in the unlawful manufacturing, sale and distribution of plaintiffs' protected, copyrighted literary works.
- 26. Defendants' violations were repeated numerous times, and were outrageous, willful, wanton, malicious, and were committed with reckless disregard for the rights of plaintiffs.
- 27. As a result of defendants' infringement, plaintiffs suffered pecuniary damages, as well as damage to her reputation, goodwill, and other damages.
- 28. Defendants are liable to plaintiffs for unlawful copyright infringement.

WHEREFORE, on Count II, plaintiff TERI WOODS demands judgment in her favor, and against all defendants, jointly and severally, as follows:

- a. For actual damages in the amount of Ten Million Dollars (\$10,000,000.00);
- b. For statutory damages of Nine Hundred Thousand Dollars (\$900,000) [\$150,000 X 6 books.]
- c. For reasonable counsel fees and litigation costs;
- d. For such other relief as this Court may deem proper.

COUNT III – CIVIL CONSPIRACY

(TERI WOODS PUBLISHING, LLC VS. ALL DEFENDANTS)

- 29. Plaintiffs incorporate all paragraphs above as if set forth in full herein.
- 30. Defendants WILLIAMS, GASCH, GLOBE, SEABURN, and URBAN KNOWLEDGE have engaged in a civil conspiracy to deprive plaintiff TERI WOODS PUBLISHING, LLC of its rights.
- 31. Defendants actions have been outrageous, and have been willful, wanton, malicious, and were committed with reckless disregard for the rights of plaintiffs.
- 32. As a result of defendants' civil conspiracy, plaintiff TERI WOODS PUBLISHING, LLC has sustained damages in the form of lost profits, lost goodwill, lost prospective business, and other monetary losses.
- 33. Defendants are liable to plaintiffs for actionable civil conspiracy.

WHEREFORE, on Count III, plaintiff TERI WOODS PUBLISHING, LLC demands judgment in its favor, and against all defendants, jointly and severally, as follows:

- a. For compensatory damages in the amount of Ten Million Dollars (\$10,000,000.00);

- b. For punitive damages for a sum to be determined by the jury at trial;
- c. For costs of suit and reasonable counsel fees;
- d. For such other relief as this Court may deem proper

COUNT IV - CIVIL CONSPIRACY

(TERI WOODS VS. ALL DEFENDANTS)

34. Plaintiffs incorporate all paragraphs above as if set forth in full herein.

35. Defendants WILLIAMS, GASCH, GLOBE, SEABURN and URBAN KNOWLEDGE have engaged in a civil conspiracy to deprive plaintiff TERI WOODS of her rights.

36. Defendants actions have been outrageous, and have been willful, wanton, malicious, and were committed with reckless disregard for the rights of plaintiffs.

37. As a result of defendants' civil conspiracy, plaintiff TERI WOODS has sustained damages in the form of lost profits, lost goodwill, lost prospective business, and other monetary losses.

38. Defendants are liable to plaintiffs for actionable civil conspiracy.

WHEREFORE, on Count IV, plaintiff TERI WOODS demands judgment in her favor, and against all defendants, jointly and severally, as follows:

- a. For compensatory damages in the amount of Ten Million Dollars (\$10,000,000.00);
- b. For punitive damages for a sum to be determined by the jury at trial;
- c. For costs of suit and reasonable counsel fees;
- d. For such other relief as this Court may deem proper

COUNT V: UNJUST ENRICHMENT

(TERI WOODS PUBLISHING, LLC VS. ALL DEFENDANTS)

39. Plaintiffs incorporate all paragraphs above as if set forth in full herein.

40. An implied-in-law, quasi-contract existed between plaintiff TERI WOODS PUBLISHING, LLC and all of the defendants, which provided, in relevant part, that in consideration for defendants' use of plaintiff's copyrighted materials for defendants' personal gain, albeit without plaintiff's consent, plaintiff shall be entitled to a quantum meruit portion of the monies gained by defendants.

41. Defendants received a monetary benefit, to plaintiff's detriment.

42. Defendants are liable to plaintiff for breach of implied-in-law, quasi-contract, because the defendants have been unjustly enriched at plaintiffs' detriment.

WHEREFORE, on Count V, plaintiff TERI WOODS PUBLISHING, LLC demands judgment in its favor, and against all defendants, jointly and severally, as follows:

- a. For compensatory damages in the amount of Ten Million Dollars (\$10,000,000.00);
- b. For costs of suit and reasonable counsel fees;
- c. For such other relief as this Court may deem proper

COUNT VI: UNJUST ENRICHMENT

(TERI WOODS VS. ALL DEFENDANTS)

43. Plaintiffs incorporate all paragraphs above as if set forth in full herein.

44. An implied-in-law, quasi-contract existed between plaintiff TERI WOODS and all of the defendants, which provided, in relevant part, that in consideration for defendants' use of plaintiff's copyrighted materials for defendants' personal gain, albeit without plaintiff's consent, plaintiff shall be entitled to a quantum meruit portion of the monies gained by

defendants.

45. Defendants received a monetary benefit, to plaintiff's detriment.

46. Defendants are liable to plaintiff for breach of implied-in-law, quasi-contract, because the defendants have been unjustly enriched at plaintiffs' detriment.

WHEREFORE, on Count V, plaintiff TERI WOODS demands judgment in her favor, and against all defendants, jointly and severally, as follows:

- a. For compensatory damages in the amount of Ten Million Dollars (\$10,000,000.00);
- b. For costs of suit and reasonable counsel fees;
- c. For such other relief as this Court may deem proper

COUNT VII: ACCOUNTING

TERI WOODS PUBLISHING, LLC AND TERI WOODS VS. ALL DEFENDANTS)

47. Plaintiffs incorporate all paragraphs above as if set forth in full herein.

48. Plaintiffs are entitled to a complete accounting from defendants, which accounting shall provide a detailed picture into all pertinent factors, inclusive but not limited to:

Identification of All Books Manufactured

Identification of All Books Distributed (including to whom and for how much)

Identification of All Books Sold (including to whom and for how much)

Gross Revenues

Gross Sales

Such other pertinent information

WHEREFORE, on Count VII, plaintiffs TERI WOODS PUBLISHING, LLC and TERI WOODS demand judgment in their favor, and against all defendants, jointly and severally, as

follows :

- a. For a full and complete accounting;
- b. For costs of suit and reasonable counsel fees;
- c. For such other relief as this Court may deem proper

COUNT VIII: CONSTRUCTIVE TRUST

(TERI WOODS PUBLISHING, LLC AND TERI WOODS VS. ALL DEFENDANTS)

49. Plaintiffs incorporate all paragraphs above as if set forth in full .

50. Plaintiffs are entitled to the imposition of a constructive trust in plaintiffs' favor.

WHEREFORE, on Count VIII, plaintiffs TERI WOODS PUBLISHING, LLC and TERI WOODS demand judgment in their favor, and against all defendants, jointly and severally, as follows:

- a. For imposition of a constructive trust in plaintiffs' favor;
- b. For costs of suit and reasonable counsel fees;
- c. For such other relief as this Court may deem proper

COUNT IX: PERMANENT INJUNCTION

(TERI WOODS PUBLISHING LLC AND TERI WOODS VS. ALL DEFENDANTS)

51. Plaintiffs incorporate all paragraphs above as if set forth in full .

52. Plaintiffs are entitled to the imposition of a permanent injunction in their favor, and against defendants, thereby barring defendants from forevermore engaging in any manner in the manufacture, distribution, and/or sale of any of plaintiffs' copyrighted materials.

53. Plaintiffs seek a bond from defendants to ensure that plaintiffs rights shall nevermore be violated.

WHEREFORE, on Count IX, plaintiffs TERI WOODS PUBLISHING, LLC and TERI WOODS demand judgment in their favor, and against all defendants, jointly and severally, as follows:

- a. For imposition of a permanent injunction against all defendants, with the proviso that defendants post a bond as security to attempt to ensure that plaintiffs' rights will not be violated in the future;
- b. For costs of suit and reasonable counsel fees;
- c. For such other relief as this Court may deem proper

COUNT X: VIOLATION OF N.J. RICO STATUTE

N.J.S.A. Sec. 2C:41-1 ET SEQ.

(TERI WOODS VS. ALL DEFENDANTS)

54. Plaintiffs incorporate all paragraphs above as if set forth in full .

55. Defendants, through their conduct, engaged in a pattern of racketeering activity with the specific purpose of defrauding plaintiffs by their enterprise.

56. Defendants by their conduct participated, directly or indirectly, in the enterprise's affairs.

57. Furthermore, defendants by their conduct, so participated in the enterprise's affairs with knowledge that someone associated with the enterprise- inclusive but not necessarily limited to the co-defendants- will commit at least two (2) predicate acts.

58. Prior to fleecing plaintiff, defendants Benjamin et al. had several communications in furtherance of the enterprise to defraud plaintiffs with the other co-defendants.

59. Defendants engaged in multiple steps in order to manufacture, distribute and sell

plaintiffs' books, inclusive but not limited to: illegally and unlawfully duplicating the books; presenting the books to a printing company for mass unlawful duplication, counterfeiting and copyright infringement; illegally transporting the counterfeit books; illegally distributing the counterfeit books to an underground black market network of booksellers; illegally and unlawfully attempting to hold these books to be authentic as if original; in otherwise engaging in unlawful racketeering actions.

60. Accordingly, all defendants are liable to plaintiff, jointly and severally, under N.J.'s civil RICO Statute.

WHEREFORE, on Count X, plaintiff TERI WOODS demands judgment in her favor, and against all defendants, jointly and severally, as follows

1. Compensatory damages for a sum to be proven at trial;
2. Treble damages;
3. Reasonable counsel fees, costs and interest;
4. Such other and further relief as this Court may deem proper.

COUNT XI: VIOLATION OF N.J. RICO STATUTE

N.J.S.A. Sec. 2C:41-1 ET SEQ.

(TERI WOODS PUBLISHING LLC VS. ALL DEFENDANTS)

61. Plaintiffs incorporate all paragraphs above as if set forth in full .

62. Defendants, through their conduct, engaged in a pattern of racketeering activity with the specific purpose of defrauding plaintiffs by their enterprise.

63. Defendants by their conduct participated, directly or indirectly, in the enterprise's

affairs.

64 . Furthermore, defendants by their conduct, so participated in the enterprise's affairs with knowledge that someone associated with the enterprise- inclusive but not necessarily limited to the co-defendants-will commit at least two (2) predicate acts.

65. Prior to fleecing plaintiff, defendants Benjamin et al. had several communications in furtherance of the enterprise to defraud plaintiffs with the other co-defendants.

66. Defendants engaged in multiple steps in order to manufacture, distribute and sell plaintiffs' books, inclusive but not limited to: illegally and unlawfully duplicating the books; presenting the books to a printing company for mass unlawful duplication, counterfeiting and copyright infringement; illegally transporting the counterfeit books; illegally distributing the counterfeit books to an underground black market network of booksellers; illegally and unlawfully attempting to hold these books to be authentic as if original; in otherwise engaging in unlawful racketeering actions.

67. Accordingly, all defendants are liable to plaintiff, jointly and severally, under N.J.'s civil RICO Statute.

WHEREFORE, on Count XI, plaintiff TERI WOODS PUBLISHING, LLC demands judgment in its favor, and against all defendants, jointly and severally, as follows

1. Compensatory damages for a sum to be proven at trial;
2. Treble damages;
3. Reasonable counsel fees, costs and interest;
4. Such other and further relief as this Court may deem proper.

COUNT XII: INVASION OF PRIVACY (FALSE LIGHT)

(TERI WOODS VS. ALL DEFENDANTS)

68. Plaintiffs incorporate all paragraphs above as if set forth in full .

69. Defendants presented TERI WOODS in a false light, thereby invading her privacy, by manufacturing inferior quality books, by altering the books so as to present an inferior, diminished product, and by misrepresenting these books to be a bona fide, authentic book by plaintiff.

70. The above-stated conduct constitutes actionable invasion of privacy, by presenting plaintiff in an inferior and false light.

WHEREFORE, on Count XII, plaintiff TERI WOODS demands judgment in her favor, and against all defendants, jointly and severally, as follows

1. Compensatory damages for a sum to be proven at trial;
2. Treble damages;
3. Reasonable counsel fees, costs and interest;
4. Such other and further relief as this Court may deem proper.

COUNT XIII: INVASION OF PRIVACY- FALSE LIGHT

TERI WOODS PUBLISHING LLC VS. ALL DEFENDANTS)

71. Plaintiffs incorporate all paragraphs above as if set forth in full .

72. Defendants presented TERI WOODS PUBLISHING, LLC in a false light, thereby invading her privacy, by manufacturing inferior quality books, by altering the books so as to present an inferior and diminished product, and by misrepresenting these books to be a bona fide, authentic book by plaintiff.

73. The above-stated conduct constitutes actionable invasion of privacy, by presenting

plaintiff in an inferior and false light.

WHEREFORE, on Count XIII, plaintiff TERI WOODS PUBLISHING, LLC demands judgment in its favor, and against all defendants, jointly and severally, as follows

1. Compensatory damages for a sum to be proven at trial;
2. Treble damages;
3. Reasonable counsel fees, costs and interest;
4. Such other and further relief as this Court may deem proper.

COUNT XIV: STATE CIVIL RIGHTS VIOLATIONS

(TERI WOODS VS. ALL DEFENDANTS)

74. Plaintiffs incorporate all paragraphs above as if set forth in full .

75. Defendants conduct as aforepleaded acted to deprive plaintiff TERI WOODS of her civil rights as assured under the New Jersey Constitution.

76. Such civil rights violations are inclusive but not limited to plaintiff's right to gainful employment, her right to earn a living, and her right to privacy.

77. Defendants are liable to plaintiff for deprivation of her civil rights as guaranteed by the New Jersey Constitution.

WHEREFORE, on Count XIV, plaintiff TERI WOODS demands judgment in her favor, and against all defendants, jointly and severally, as follows

1. Compensatory damages for a sum to be proven at trial;
2. Treble damages and statutory damages;
3. Reasonable counsel fees, costs and interest;
4. Such other and further relief as this Court may deem proper.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs further request the following relief:

- a. The relief set forth in each of the above stated causes of action; and
- b. Such other relief at law or equity as this Court deems just.

Respectfully submitted,

Dated: August 23, 2012

/Simon Rosen, Esquire/ (#6279)
Attorney I.D. #38603

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Philadelphia, PA 19103

Tel. (215)564-0212
Fax (215)972-5390

SimonOnKey@aol.com

Public Catalog
Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = Woods Teri
Search Results: Displaying 9 of 15 entries

Dutch.

Type of Work: Text
Registration Number / Date: TX0006125969 / 2005-02-08
Title: Dutch.
Notes: Cataloged from appl. only.
Copyright Claimant: Teri Woods Publishing
Date of Creation: 2002
Date of Publication: 2003-11-15
Authorship on Application: Kwame Teague, 1972- (Dutch, pseud.) & Teri Woods, 1968-.
Previous Registration: Prev. reg. 2003, TXu 1-100-936.

Names: Teague, Kwame, 1972-
Woods, Teri, 1968-
Teri Woods Publishing
Dutch, pseud.

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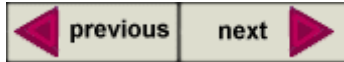
EXHIBIT P-1

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = Woods Teri

Search Results: Displaying 10 of 15 entries



Labeled View

Dutch II : Angel's revenge : the second of a trilogy.

Type of Work: Text

Registration Number / Date: TXu001200973 / 2005-02-02

Title: Dutch II : Angel's revenge : the second of a trilogy.

Description: 269 p.

Notes: Fiction.

Copyright Claimant: Teri Woods, 1968-

Date of Creation: 2005

Authorship on Application: Terri Woods & Kwame Teague, 1972- (Dutch, pseud.)

Variant title: Dutch II : Angel's revenge

Names: [Woods, Teri, 1968-](#)
[Teague, Kwame, 1972-](#)
[Dutch, pseud.](#)

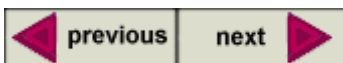
EXHIBIT P-2

Public Catalog

Copyright Catalog (1978 to present)

Search Request: Left Anchored Name = Woods Teri

Search Results: Displaying 11 of 15 entries



Labeled View

Dutch III-International Gangster.

Type of Work: Text

Registration Number / Date: TXu001726014 / 2011-03-01

Application Title: Dutch III-International Gangster.

Title: Dutch III-International Gangster.

Description: Print material,.

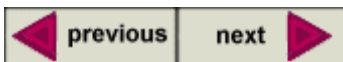
Copyright Claimant: Teri Woods, 1968- . Address: 816 Undercliff Avenue, Edgewater, NJ, 07020, United States.

Date of Creation: 2010

Authorship on Application: Teri Woods, 1968- ; Domicile: United States; Citizenship: United States. Authorship: text.

Rights and Permissions: Teri Woods, 816 Undercliff Avenue, Edgewater, NJ, 07020, United States, (201) 969-4830, teriwoods@verizon.net

Names: [Woods, Teri, 1968-](#)



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Full Record



Format for Print/Save

Enter your email address:

EXHIBIT P-3

EXHIBIT P-4

RUS-22-2012 L3111F FROM

TCN157753393

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Margareth Peters

Register of Copyrights, United States of America

FORM TX

For a Dramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TXU 1-237-274



EFFECTIVE DATE OF REGISTRATION

4 25 05
Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

TITLE OF THIS WORK

1

Draddy Ruins

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work

If published in a periodical or serial, give: Volume Number Issue Date No. Pages

2

a NAME OF AUTHOR
Curio Smith

DATE OF BIRTH AND DEATH
Year Born Year Died

Was this contribution to the work a "work made for hire"?

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR
Citizen of *USA*
Domiciled in *USA*

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonym? ☐ Yes ☒ No

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of the work that was made for hire, check "Yes" in the space provided, give the employer's name, address, and dates of birth and death.

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

Copyright in the Ruins family, a mob family in Texas

b NAME OF AUTHOR
Levi Woods

DATE OF BIRTH AND DEATH
Year Born Year Died

Was this contribution to the work a "work made for hire"?

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR
Citizen of *USA*
Domiciled in *USA*

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonym? ☐ Yes ☒ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

Copyright in the Ruins family, a mob family in Texas

c NAME OF AUTHOR

DATE OF BIRTH AND DEATH
Year Born Year Died

Was this contribution to the work a "work made for hire"?

AUTHOR'S NATIONALITY OR DOMICILE
Name of Country

OR
Citizen of *USA*
Domiciled in *USA*

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous? ☐ Yes ☒ No
Pseudonym? ☐ Yes ☒ No

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed.

3

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2004

DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Country of Publication Month Day Year

4

EMPLOYER CLAIMANT(S) Name and address must be given even if the claimant is the same as the author (give in space 2)

Levi Woods, 15 W. 24th St. 4th fl. NY NY 10013

TRANSFER If the claimant named here in space 4 is not the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright.

APR 25 2006

APR 25 2006

TWO DEPOSITS RECEIVED

PAID RECEIVED

MORE ON BACK • Complete all applicable spaces (numbers 1-9) on the reverse side of this page.
• See instructions on the back.

DO NOT WRITE HERE
Page 1 of 2 pages

AUG-22-2012 12:13P FROM:

TO: 12159725350

P. 3/7

EXAMINED BY <u>ELC</u>	FORM TX
CHECKED BY _____	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
<input type="checkbox"/> Yes	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give Previous Registration Number >

Year of Registration >

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name >

Account Number >

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/ZIP >

Teel Woods, 15 W. 84th St. 4th Fl. NY, NY 10010

Area code and daytime telephone number > 212-252-8445

Fax number > 212-252-8494

Email > teelimmp2000@aol.com

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one >

- ☒ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☐ authorized agent of

of the work identified in this application and that the statements made by me in this application are true to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) >

Typed or printed name and date > If this application gives a date of publication in space 3, do not sign and submit it before that date.

Teel Woods

Date > 3-30-05

Handwritten signature >

x Teel Woods

Certificate will be mailed in window envelope to this address:

Name >

Teel Woods

Number/Street/Apt. >

15 W. 84th St. 4th Fl.

City/State/ZIP >

NY, NY 10010

YOU MUST

- Complete all necessary spaces

- Sign your application in space 8

- SEND ALL A FEES/FEES TO THE CLERK OF THE COURT

1. Application fee

2. Renewal fee

3. Renewal fee

4. Renewal fee

5. Renewal fee

6. Renewal fee

7. Renewal fee

8. Renewal fee

9. Renewal fee

10. Renewal fee

*17 U.S.C. § 504(c): Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 405, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

August 2009—©00 000

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U.S. GOVERNMENT PRINTING OFFICE: 2000-481-113/20,000

EXHIBIT P-4

AUG-22-2012 12:13P FROM:

TO:121507057BU

P.2/7

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

FORM TX

For a Non-dramatic Literary Work
UNITED STATES COPYRIGHT OFFICE

TXU 1-298-031

REGISTERED

EFFECTIVE DATE OF REGISTRATION

MAY 22, 2006

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

1

TITLE OF THIS WORK

Deadly Reigns II

PREVIOUS OR ALTERNATIVE TITLES

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared Title of Collective Work

If published in a periodical or serial give: Volume Number Issue Date On Page

2

a *Clinton Smith*

Was this contribution to the work a "work made for hire"?

☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

Citizen of *USA*

OR Domiciled in

DATES OF BIRTH AND DEATH

Year Born

Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?

☒ Yes

☐ No

Pseudonymous?

☒ Yes

☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed

NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire," check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

b *Teri Woods*

Was this contribution to the work a "work made for hire"?

☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

Citizen of *USA*

OR Domiciled in

DATES OF BIRTH AND DEATH

Year Born

Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?

☐ Yes

☒ No

Pseudonymous?

☐ Yes

☒ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed

c

Was this contribution to the work a "work made for hire"?

☐ Yes

☒ No

AUTHOR'S NATIONALITY OR DOMICILE

Name of Country

Citizen of

OR Domiciled in

DATES OF BIRTH AND DEATH

Year Born

Year Died

WAS THIS AUTHOR'S CONTRIBUTION TO THE WORK

Anonymous?

☐ Yes

☐ No

Pseudonymous?

☐ Yes

☐ No

If the answer to either of these questions is "Yes," see detailed instructions

NATURE OF AUTHORSHIP Briefly describe nature of material created by this author in which copyright is claimed

3

a

YEAR IN WHICH CREATION OF THIS WORK WAS COMPLETED

2006

This information must be given in all cases.

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK

Complete this information ONLY if this work has been published.

Month Day Year

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2

Teri Woods, 350 5th Ave. Ste 824, NY, NY 10118

NY, NY 10118

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright

APPLICATION RECEIVED

ONE DEPOSIT RECEIVED

MAY 22 2006

TWO DEPOSITS RECEIVED

FUNDS RECEIVED

MORE ON BACK Complete all applicable spaces (numbers 5-9) on the reverse side of this page.

• Read detailed instructions

• Fill in the form in ink

DO NOT WRITE HERE

EXHIBIT P-5

AUG-22-2012 12:14P FROM:

TO: 12159725330

P. 5

EXAMINED BY <u>MS</u>	FORM TX
CHECKED BY <u>MS</u>	
<input type="checkbox"/> CORRESPONDENCE	FOR COPYRIGHT OFFICE USE ONLY
Yes	

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box.)a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by the author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number >

Year of Registration >

5

DERIVATIVE WORK OR COMPILATION

Preexisting Material Identify any preexisting work or works that this work is based on or incorporates.

a 6

See instructions before completing this space

Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed.

b

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

a 7

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/ZIP

Teri Woods · 350 5th Ave · Ste 824 · NY, NY, 10118

b

Area code and daytime telephone number > 212-252-8445

Fax number > 212-252-8494

Email > twwoods@verizon.net

CERTIFICATION I, the undersigned, hereby certify that I am the

Check only one >

- ☒ author
☐ other copyright claimant
☐ owner of exclusive right(s)
☐ authorized agent of

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Name of author or other copyright claimant, or owner of exclusive right(s) >

Teri Woods

8

Typed or printed name and date If this application gives a date of publication in space 3, do not sign and submit it before that date.

Teri Woods

Date > 5-12-06

Handwritten signature (X) >

X Teri Woods

Certification will be mailed in window envelope to this address:

NAME > Teri Woods Publishing
 Number/Street/Apt. > 350 5th Ave · Ste 824
 City/State/ZIP > NY, NY 10118

9
 1. Application form
 2. Nonrefundable filing fee in check or money order payable to Registrar of Copyrights
 3. Deposit material
 4. Library of Congress Copyright Office
 101 Independence Avenue, S.E.
 Washington, D.C. 20540-0001

17 U.S.C. § 506(a) Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 405, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

U.S. GOVERNMENT PRINTING OFFICE: 2000-481-112/80-006

EXHIBIT P-5

AUG-22-2013 12:14P FROM:

TO: 18155753390

P. 3/7

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Margareth Peters

Register of Copyrights, United States of America

Registration Number

TXu 1-620-991

Effective date of
registration:

June 29, 2009

Title _____

Title of Work: Deadly Reigns III

Completion/ Publication _____

Year of Completion: 2009

Author _____

Author: Teri Woods

Author Created: text

Work made for hire: No

Citizen of: United States

Domiciled in: United States

Anonymous: Yes

Copyright claimant _____

Copyright Claimant: Teri Woods

880 River Road, Suite 3, Edgewater, NJ, 07020, United States

Certification _____

Name: Teri Woods

Date: June 11, 2009

03-22-2012 10:14P EST

0012154725390

P. 7/7

Registration #: TXU001620991

Service Request #: 1-203639291

Teri Woods Publishing, LLC
Teri Woods
880 River Road
Suite 3
Edgewater, NJ 07020 United States

EXHIBIT P-6